IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	
	§	**CRIMINAL NO: 4:07-CR-00065**
JOEL HERNALDO PAREDES-GOMEZ	§	
	§	
	§	

DEFENDANT, JOEL HERNALDO PAREDES-GOMEZ UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT

COMES NOW, Defendant, JOEL HERNALDO PAREDES-GOMEZ, by and through his attorney of record, and respectfully moves this Honorable Court to extend the time for filing objections to the Presentence Investigation Report ("PSI") by one (1) day to October 23, 2012, and states as follows:

1. On September 25, 2012 this Honorable Court entered its order granting the Defendant's unopposed motion to continue sentencing [D.E 207]. Sentencing hearing is presently scheduled for November 9, 2012. An additional day (1) day beyond the present October 22, 2012 deadline for filing objections is herein requested. Counsel for Defendant un expectantly had to fly to Corpus Christi on Friday, and could not meet his objection deadline until today, October 23, 2012, which is a day after the original date given.
2. The Government had advised counsels that they preferred to have the sentencing of Defendants, JOEL HERNALDO PAREDES-GOMEZ and JOHN ALEX MARROQUIN-PATINO, conducted on the same day, November 9, 2012.
3. This motion is made in the interest of justice and not for the purposes of delay.

WHEREFORE, Defendant, JOEL HERNALDO PAREDES-GOMEZ, respectfully prays that this Honorable Court enter its order granting the within unopposed motion to extend the date for the filing of objections to the PSI to October 23, 2012.

Respectfully submitted,

/s/WENDELL A. ODOM, JR.
WENDELL A. ODOM, JR.
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Attorney for Defendant,
JOEL HERNALDO PAREDES-GOMEZ

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Motion for Extension of Time to File Objections to the Pre-Sentence Investigation Report** was electronically filed and sent to the Assistant United States Attorney in this cause and the United States Probation Department as well as all counsel representing co-defendants on this the 23rd day of October, 2012.

/s/WENDELL A. ODOM, JR.
WENDELL A. ODOM, JR.

CERTIFICATE OF CONFERENCE

Counsel for Defendant has spoken to the Assistant United States Attorney in this cause, James H. Sturgis, and he has no objection to this continuance.

/s/WENDELL A. ODOM, JR.
WENDELL A. ODOM, JR.